# UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Richmond Division

SHERI WADE	)
Plaintiff,	)
v.	) Case No. 3:18-cv-00828-MHL
INTERWORKS UNLIMITED, INC.	)
Defendants.	) ) )

#### AFFIDAVIT OF JONATHAN E. HALPERIN

- I, Jonathan E. Halperin, being duly sworn, hereby depose and state as follows:
- 1. I am over the age of 18. I have personal knowledge of the matters set forth below and can completely testify to them if and when called upon to do so.
- 2. I am an attorney for the law firm of Halperin Law Center, LLC, who is representing the plaintiff in the above-captioned matter.
- 3. On November 30, 2018, Plaintiff Sheri Wade ("Plaintiff") filed a lawsuit against Defendant Interworks Unlimited, Inc. ("Defendant"), in the United States District Court for the Eastern District of Virginia, Richmond Division seeking judgment for its violation of the Virginia Consumer Protection Act and breach of express warranties.
- 4. On January 8, 2019, Defendant was served with a copy of the Summons and Complaint via service on the Secretary of the Commonwealth in accordance with Va. Code Ann. § 8.01-329 and Rule 4(h)(l)(A) of the Federal Rules of Civil Procedure. This Court's docket entry provided that Defendant's answer was due on February 12, 2019. (ECF No. 4)



- 5. I hereby certify that copies of the Complaint, Summons, and other documents served upon Defendant were mailed to Eric H. Lu (registered agent) at the address of 2418 Peck Road, City of Industry, CA 90601, on January 17, 2019.
- 6. On February 14, 2019, I obtained a copy of the docket report in the abovecaptioned case from PACER, and, upon reviewing the docket report, determined that the defendant failed to file an Answer or any responsive pleadings in this matter. A copy of the docket report is attached hereto as Exhibit 1.
- 7. I further certify that Defendant is not a minor, incompetent person, or person in active military service.

FURTHER THIS AFFIANT SAYETH NOT.

Jonathan E. Halperin

CITY/COUNTY OF COMMONWEALTH OF VIRGINIA

I hereby certify that on the 14th day of February, 2019, before me appeared, Jonathan E. Halperinand executed this instrument.



My commission expires:  $\frac{5/31/21}{}$ 

# U.S. District Court Eastern District of Virginia - (Richmond) CIVIL DOCKET FOR CASE #: 3:18-cv-00828-MHL

Wade v. Interworks Unlimited, Inc.

Assigned to: District Judge M. Hannah Lauck

Demand: \$2,000,000

Cause: 28:1332 Diversity-Product Liability

Date Filed: 11/30/2018 Jury Demand: Plaintiff

Nature of Suit: 365 Personal Inj. Prod.

Liability

Jurisdiction: Diversity

### **Plaintiff**

Ms. Sheri Wade

## represented by **Brandon Hilmar Reid**

Reid Goodwin PLC 4116 Fitzhugh Ave Richmond, VA 23238 (804) 415-7800 Fax: (804) 415-7560

Email: breid@reidgoodwin.com ATTORNEY TO BE NOTICED

## Jonathan Eric Halperin

Halperin Law Center 5225 Hickory Park Drive Suite B Glen Allen, VA 23059 804-527-0100

Fax: 866-335-1502

Email: jonathan@halperinlegal.com *ATTORNEY TO BE NOTICED* 

#### **Defendant**

Interworks Unlimited, Inc.

<b>Date Filed</b>	#	Docket Text	
11/30/2018	1	Complaint (Filing fee \$ 400, receipt number 0422-6386927.), filed by Sheri Wade. (Attachments: # 1 Exhibit A - User Manual, # 2 Civil Cover Sheet)(Halperin, Jonathan) (Entered: 11/30/2018)	
11/30/2018	2	Proposed Summons by Sheri Wade. (Halperin, Jonathan) (Entered: 11/30/2018)	
11/30/2018		Case assigned to District Judge M. Hannah Lauck. (jsmi, ) (Entered: 11/30/2018)	
11/30/2018	3	Summons Issued as to Interworks Unlimited, Inc. NOTICE TO ATTORNEY: Print out two electronically issued summons and one copy of the attachments for each defendant to be served with the complaint. (jsmi, ) (Entered: 11/30/2018)	
01/22/2019	4	SUMMONS Returned Executed. Interworks Unlimited, Inc. served on 1/22/2019, answer due 2/12/2019. (jsmi, ) (Entered: 01/24/2019)	
01/31/2019	<u>5</u>	NOTICE of Appearance by Brandon Hilmar Reid on behalf of Sheri Wade (Reid, Brandon) (Entered: 01/31/2019)	

PACER Service Center							
Transaction Receipt							
02/14/2019 16:15:55							
PACER Login:	hlc32413:3936539:0	Client Code:	Wade				
Description:	Docket Report	Search Criteria:	3:18-cv-00828- MHL				
Billable Pages:	1	Cost:	0.10				